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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 1, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N. W., Room 222
Washington, D.C. 20005

Reference: Opposition to PR Docket No. 92-235

Dear Ms. Searcy:

Presently Wyoming's static population is approximately 483,000. The Wyoming Travel Commission estimates 11,000,000 tourists visit areas of Wyoming annually, and most travel to Wyoming by vehicle using the state highway system. It is also estimated 700,000 commercial vehicles operate on our highways annually.

The Wyoming Highway Patrol is responsible for over 6,000 miles of state and federal highways. The Highway Patrol provides communication services statewide for 161 Highway Patrolmen, 140 Game and Fish units and 130 Brand inspectors, and numerous other State and Federal Public Safety entities.

The Wyoming Highway Patrol is sympathetic to the problems of limited radio frequency spectrum, and comprehends the need for creativity in spectrum management by the FCC. The department believes Docket 92-235 neglects significant problems to be incurred by the licensee, when licensee is mandated to narrow band existing systems by 1996 and then to totally discontinued use of aforementioned systems by 2004.

Presently, the Highway Patrol operates three statewide VHF systems. The Highway Patrol utilizes the Patrol and the Mutual Aid systems for statewide communications. The Mutual Aid system is also used by all public safety entities statewide. The third VHF system, the State Agency Law Enforcement Communications System (SALECS), is also controlled from the Highway Patrol communications center in Cheyenne. This system provides communications for Wyoming's Game and Fish Department, State Department of Criminal Investigation and various other law enforcement entities throughout the state.

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At first review there were some basic problems with Docket 92-235, known as Part-88:

- (1) Part 88 by its very nature will require systems to be completely changed out with no flexibility or opportunity for a structured migration toward the newer or alternate communications technologies. Part 88 does not consider the extreme cost to convert, which becomes an immense issue given this state's economic condition, not to mention the nation's. The cost to the Highway Patrol to change out all equipment and add possibly ten (10) new sites, will cost approximately two (2) million dollars.
- (2) Interoperability between new and old system, such as between the new Part 88 VHF 5 kHz equipment and federal 6.25 kHz equipment.
- (3) There are more technical problems in Part 88 than will be addressed in this document, but some are readily apparent.
 - (a) Immediate reduction to 3 kHz deviation will result in range reduction of 40%, plus problems in generating sufficient receive audio output power, especially in high noise areas (snow plows, heavy equipment, etc.). Additionally, reduced deviation will cause CTCSS decoder failure, this means unreliable system performance.
 - (b) Reduced transmitter power will result in reduced coverage, which in Wyoming is a primary concern. In many cases, reducing power to the new Part 88 limits will cause serious spurious emissions from power amplifiers.

In this letter we have pointed out but few of the problems for the Public Safety radio system users in Wyoming, which Docket 92-235 does not address. Along with the unaddressed problems, there are other problems appearing daily as we continue to review Part 88 and talk with our counterparts, nationwide.

After complete review of the docket, the Wyoming Highway Patrol finds reason to request the FCC re-evaluate its position on Part 88.

Sincerely,



Colonel E. L. Ayers
Administrator

ELA:sda